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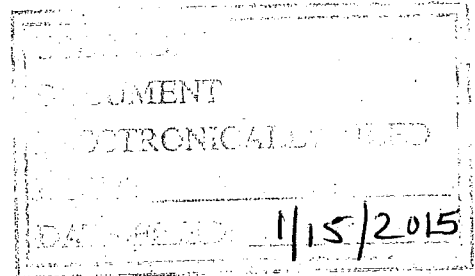
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January 9, 2015

Hon. Denise L. Cote  
U.S. District Court  
500 Pearl St  
NY, NY 10001



Re: *US v. Budovsky* 13 cr 368 (DLC)

Dear Judge Cote:

I am counsel for Arthur Budovsky the defendant in the above referenced matter. By this letter, I respectfully request the case be scheduled for a status conference.

Mr. Budovsky initially appeared, and was arraigned, before Your Honor on October 14, 2014. On that date, he was represented by prior counsel. During that appearance, a schedule was set where discovery was to be provided by November 7, 2014, defense motions were due by January 23, 2015 and the trial date was set for September 21, 2015.

Subsequently, on November 17, 2014, prior counsel was relieved and I was appointed counsel. At that point, arrangements still had not been made for the purchase of hard drives needed for the production of discovery. Following my appointment, I purchased the hard drives and had them forwarded to the case agent. Thereafter, the discovery was delivered to my office, in due course, on December 23, 2014. I was out of town during that week, but was able to commence my review upon my return the following week. Since then, the Government informs additional discovery will be produced which requires the purchase of additional hard drives. I have ordered the needed drives which will be delivered to the case agent.

As the Court has been apprised, the initial round of electronic discovery is on 52 terabytes of data storage. The second round will be produced on an additional 12 terabytes of data storage. It is my understanding this is one of the largest amount of electronic discovery produced in a case brought by the SDNY U.S. Attorney's Office. I have begun to review the discovery. Even based upon my preliminary review, it is readily apparent that, in addition to being voluminous, it is complex as it contains are multiple file formats which will need multiple programs to search and review it.

*A conference will be held on  
1/27 at 4:00 p.m.  
James G. Pittell  
1/15/15*

Due to this large volume of discovery, and aforementioned timing of my receipt, by this letter, I respectfully request a conference to discuss, among any other matters, the rescheduling of the dates for motion practice and to discuss the possibility of rescheduling the trial date. It is my understanding the Court is available on January 27, 2015 at 11 a.m. Accordingly, I respectfully request the matter be scheduled for this date and time.

Respectfully submitted,

/s/

Jeffrey Pittell

cc: AUSA Andrew Goldstein  
AUSA Christine Magdo